

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**STIPULATED ORDER REGARDING DEPOSITION
DESIGNATIONS AND CORRESPONDING EXHIBITS**

Pursuant to final agreement reached and this Court's directive, this Stipulation is made and entered into by the undersigned parties with reference to the following:

1. Defendants shall provide counter-designations and objections to Plaintiffs' designations for David Hamilton, Gabriel Sterling, Merritt Beaver, and Juan Gilbert no later than Thursday, January 18, 2024, at 6:00pm; and,
2. The parties shall submit a list of Plaintiffs' designations for David Hamilton, Gabriel Sterling, Merritt Beaver, and Juan Gilbert, incorporating Defendants' counter-designations, together with the exhibits Plaintiffs intend to offer into evidence through those designations, before the close of Plaintiffs' case-in-chief; and,

3. The parties and the Court shall consider the designations, counter-designations, and exhibits included in that list as introduced into the trial record by the end of Plaintiffs' case-in-chief; and,
4. Plaintiffs are permitted to physically tender their final set of deposition designations incorporating Defendants' counter-designations and corresponding video files during Defendants' case-in-chief for physical entry into the trial record.

The parties agree that this approach will increase efficiency for the parties and the Court.

IT IS SO ORDERED this 18th day of January, 2024.



U.S. District Court Judge Amy Totenberg

Respectfully submitted this 18th day of January, 2024.

/s/ David D. Cross

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CERTIFICATE OF COMPLIANCE

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ David D. Cross
David D. Cross

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CERTIFICATE OF SERVICE

I hereby certify that on January 18, 2024, a copy of the foregoing
**[PROPOSED] STIPULATED ORDER REGARDING DEPOSITION
DESIGNATIONS AND CORRESPONDING EXHIBITS** was electronically
filed with the Clerk of Court using the CM/ECF system, which will automatically
send notification of such filing to all attorneys of record.

/s/ David D. Cross
David D. Cross